

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**DISPLAY TECHNOLOGIES LLC,**

Plaintiff,

v.

**RICOH AMERICAS CORPORATION,**

Defendant.

**Civil Action No. 2:15-cv-1631**

**JURY TRIAL DEMANDED**

**PLAINTIFF DISPLAY TECHNOLOGIES LLC’S ANSWER TO DEFENDANT RICOH  
AMERICAS CORPORATION’S COUNTERCLAIMS**

Plaintiff, Display Technologies LLC (“Plaintiff”), answers the Counterclaims of Defendant Ricoh Americas Corporation (“Defendant”) filed December 15, 2015 (Dkt. No. 14). Plaintiff answers the Counterclaims of Defendant by corresponding paragraph number as follows:

**COUNTERCLAIMS**

**THE PARTIES**

1. Admitted.
2. Admitted.

**JURISDICTION AND VENUE**

3. Plaintiff admits that these counterclaims purport to arise under the patent laws of 28 U.S.C. §§ 1331, 1338, the Patent Act, 35 U.S.C. § 100 *et seq.*, and 28 U.S.C. § 2201, *et seq.* Except as so admitted, the remaining allegations in paragraph 3 are denied.

4. Admitted.

5. Plaintiff admits that venue is proper under 28 U.S.C. §§ 1391(b)-(c) and 1400(b). Except as so admitted, the remaining allegations in paragraph 5 are denied.

**FIRST COUNTERCLAIM**  
**(Declaration of Non-Infringement)**

6. Plaintiff incorporates by reference the allegations and statements set forth in the preceding paragraphs of these Answers to Defendant's Counterclaims in their entirety as if set forth herein.

7. Admitted.

8. Admitted.

9. Admitted.

10. Plaintiff admits an actual case or controversy has arisen and exists between Plaintiff and Defendant in regards to Defendant's infringement of the '195 Patent. Except as so admitted, the remaining allegations in paragraph 10 are denied.

11. Denied.

12. Plaintiff admits that Defendant seeks a judicial determination of its rights and duties with respect to the alleged infringement '195 Patent. However, Plaintiffs deny that Defendant is entitled to any such relief. Except as so admitted, the remaining allegations in paragraph 12 are denied.

13. Denied.

**SECOND COUNTERCLAIM**  
**(Declaration of Patent Invalidity)**

14. Plaintiff incorporates by reference the allegations and statements set forth in the preceding paragraphs of these Answers to Defendant's Counterclaims in their entirety as if set forth herein.

15. Admitted.

16. Plaintiff admits that Defendant seeks a judicial determination of its rights and duties with respect to the alleged infringement '195 Patent. However, Plaintiffs deny that

Defendant is entitled to any such relief. Except as so admitted, the remaining allegations in paragraph 16 are denied.

17. Denied.

18. Plaintiff admits that Defendant seeks a judicial determination of its rights and duties with respect to the alleged invalidity '195 Patent. However, Plaintiffs deny that Defendant is entitled to any such relief. Except as so admitted, the remaining allegations in paragraph 18 are denied.

19. Denied.

### **JURY DEMAND**

Defendant's Demand for Jury Trial is an averment to which no responsive pleading is required pursuant to FED. R. CIV. P. 8(d) and is therefore denied.

### **PRAYER FOR RELIEF**

Defendant's Prayer for Relief is an averment to which no responsive pleading is required pursuant to FED. R. CIV. P. 8(d) and is therefore denied.

DATED January 5, 2016.

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF  
DISPLAY TECHNOLOGIES, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 5th day of January, 2016, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Krystal L. Gibbens

Krystal L. Gibbens